

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - (NESHAP) - RENEWAL

PERMITTEE

Georgia-Pacific Corporation
Attn: Jose Rocha
440 East 138th Street
Chicago, Illinois 60827

Application No.: 72120453

I.D. No.: 031600BQB

Applicant's Designation: FESOP

Date Received: March 3, 2006

Subject: Box Plant

Date Issued:

Expiration Date:

Location: 440 East 138th Street, Chicago, 60627

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a box plant (3 gas-fired boilers, 1 scrap paper separator with a cyclone, 1 starch silo with a baghouse, 4 flexo-folder gluers and 3 die cutters (flexo printing)) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for VOM, 10 tons/year for a single HAP, and 25 tons/year for a combination of HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- ii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.

b. Prior to initial issuance of a FESOP to this source, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permits issued for this location.

2. The wide-web flexographic printing is subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants (HAP) emissions from the printing operations, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

- 3a. This permit is based on the source meeting the criteria for an area source (i.e. less than 10 tons per year of individual HAP and 25 tons per year of combined HAP for each rolling 12-month period).
- b. The Permittee shall meet the recordkeeping requirements in 40 CFR 63.829(d) and this permit to demonstrate the area source status.
- c. The Permittee shall meet the reporting requirements in 40 CFR 63.830(b)(1) and 63.9(b).
- 4a. The 24.5-mmBtu/hour natural-gas-fired boiler is subject to the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The Permittee shall fulfill applicable notification and recordkeeping requirements, pursuant to 40 CFR 60.7 and 40 CFR 60.48.
- c. At all times, the Permittee shall maintain and operate the boiler in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11(d).
- 6a. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
- 7. This permit is issued based upon the source being subject to the VOM control requirements of 35 Ill. Adm. Code 218, Subpart H: "Flexographic and Rotogravure Printing". The Permittee shall meet 35 Ill. Adm. Code 218.401(a) by not applying flexographic coatings or inks which exceed the following:
 - a. 40% VOM by volume of the coating and ink (minus water and any other exempt compounds from VOM), or
 - b. 25% VOM by volume of the volatile content of the coating and ink.

8. Emissions and operation of all printing and gluing operations shall not exceed the following limits:

Emission Unit	VOM* Usage		VOM* Emissions	
	(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
Presses including any Cleanup and Other Solvents	1.9	19.0	1.9	19.0

* Volatile Organic Material

These limits are based on material usage and the VOM content. Compliance with annual limits shall be determined from a running total of 12 months of data.

9. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 10a. Emissions and operation from all natural gas combustion shall not exceed the following limits:

Natural Gas Firing Rate		E M I S S I O N S		E M I S S I O N S	
(mmscf/Month)	(mmscf/Year)	Nitrogen Oxides (Tons/Mo)	Nitrogen Oxides (Tons/Yr)	Carbon Monoxide (Tons/Mo)	Carbon Monoxide (Tons/Yr)
35.3	352.8	1.77	17.64	1.48	14.82
Particulate Matter		E M I S S I O N S		E M I S S I O N S	
(Tons/Mo)	(Tons/Yr)	Volatile Organic Material (Tons/Mo)	Volatile Organic Material (Tons/Yr)	Sulfur Dioxide (Tons/Mo)	Sulfur Dioxide (Tons/Yr)
0.13	1.34	0.10	0.97	0.01	0.10

These limits are based on standard emission factors (AP-42, 1.4) and maximum natural gas usage. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel fired in the boilers. Use of any other fuel shall require prior approval by the Illinois EPA.
- 11a. Operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Rate	Particulate Matter Emissions	
		(Tons/Mo)	(Tons/Yr)

Starch Silo	500 Tons/Mo & 6,000 Tons/Yr	0.01	0.12
Scrap Paper Separator	2 Tons/Hr & 17,520 Tons/Yr	1.35	16.21

- b. Compliance with annual limits shall be determined on a rolling monthly basis from the sum of the data for the current month and the preceding 11 months.

- 12a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. Pursuant to 35 Ill. Adm. Code 218.404(c)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating and ink as applied on each printing line.
 - ii. The VOM content of each coating and ink as applied each day on each printing line.
- c. The Permittee shall maintain monthly and annual records of the following:
- i. Names and amounts of inks, adhesives, and solvents used (gallons/month and gallons/year).
 - ii. VOM and HAP content of each ink and solvent used (lbs/gallon).
 - iii. Natural gas usage (scf/month and scf/year)

- iv. Monthly and annual VOM and HAP emissions with supporting calculations (tons/month and tons/year).
 - v. Monthly and annual CO, NOx, PM, and VOM emissions from the boiler with supporting calculations (tons/month and tons/year).
 - c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 13a. Pursuant to 35 Ill. Adm. Code 218.404(c)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall notify the Agency in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.401(a) of 35 Ill. Adm. Code Part 218 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d) or (e), respectively.
- 13b. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
14. Two (2) copies of required reports and notifications shall be sent to:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please call Dwayne Booker at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DLB:psj

cc: Illinois EPA, FOS Region 1
USEPA-Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the box plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (100 tons/year for VOM, 10 tons/year for a single HAP, and 25 tons/year for a combination of HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					HAPs	
	<u>NO_x</u>	<u>CO</u>	<u>PM</u>	<u>VOM</u>	<u>SO₂</u>	<u>Single</u>	<u>Combined</u>
Gas-Fired Boiler	17.64	14.82	1.34	0.97	0.10		
Scrap Paper Separator			16.21				
Starch Silo			0.12				
Flexo-Folder Gluers and Die Cutters				19.00			
Totals	17.64	14.82	17.67	19.97	0.10	< 10	< 25

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